

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

PEOPLE OF THE STATE OF)
CALIFORNIA *ex rel.* FEATHER RIVER)
AIR QUALITY MANAGEMENT) Civ. No. 2:24-cv-01406-CSK
DISTRICT,)
Plaintiff,) **NOTICE OF TENTATIVE SETTLEMENT**
v.) **AND STIPULATION AND {PROPOSED}**
UNITED STATES POSTAL SERVICE) **ORDER TO EXTEND DEFENDANTS'**
MARYSVILLE POST OFFICE, *et al.*,) **DEADLINE TO RESPOND TO**
Defendants.) **COMPLAINT**

Plaintiff People of the State of California, *ex rel.* Feather River Air Quality Management District (“FRAQMD”), and Defendants United States Postal Service Marysville Post Office and Fred Stewart, in his official capacity as United States Postmaster (collectively, “the Parties”), stipulate as follows:

1. The Parties have engaged in fruitful settlement discussions. The Parties have now negotiated an out-of-court settlement that will resolve all of Plaintiff's claims without further litigation.
 2. The settlement is now subject to approval by the appropriate officials at the United States Postal Service and the United States Department of Justice.
 3. Once the settlement is executed, the Postal Service will have 90 days to make an agreed upon payment to Plaintiff.
 4. Defendants' current deadline to respond to Plaintiff's Complaint is October 25, 2024. This deadline has been extended twice before by 28 days and 60 days. ECF Nos. 6, 11.
 5. Defendants expect that they will have the settlement executed in the next few weeks.
 6. The Parties agree that 120-day extension of Defendants' response deadline will benefit all Parties and conserve the Court's resources. The Parties believe this extension will provide the

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND RESPONSE DEADLINE
CASE No. 2:24-CV-01406-CSK**

1 time needed to receive final approvals, execute the settlement, make the agreed upon payment,
2 and fully resolve this case. Upon completion of the settlement terms, the Parties will promptly
3 notify the Court and dismiss the case.

4 7. Pursuant to Local Civil Rule 144(a), the Parties respectfully request that the Court enter
5 the attached Proposed Order and extend Defendants' response deadline by 120 days to February
6 24, 2025.

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8 Dated: October 22, 2024

Respectfully submitted,

9
10 /s/ Paul Caintic
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21 Counsel for Plaintiff

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2 **{PROPOSED} ORDER**

3 Based on the foregoing stipulation and good cause appearing, it is **HEREBY**
4 **ORDERED** that:

- 5 1. Defendants' deadline to respond to Plaintiff's Complaint, ECF No. 1, is extended by 120
6 days to February 24, 2025.

7 DATED: October 29, 2024

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9 Chi Soo Kim
United States Magistrate Judge

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